



Local 7-669 AFL-CIO • CLC

To: U.S. Nuclear Regulatory Commission (by certified mail)
Marquis One Tower
245 Peachtree Center Avenue N.E., Suite 1200
Atlanta, GA 30303
Attn: James Hickey

11/10/13

Re: Honeywell Metropolis, Illinois facility

Dear Mr. Hickey,

I have concerns about your agency and Honeywell have denied my organization the right to have a walk around representative of our choosing present during the NRC inspection the week of November 4, 2013. We have made multiple attempts to exercise our rights under 10 CF 19.14, however I received multiple responses from your agency why it has been acceptable for Honeywell to deny our attempts including the following:

- the NRC has no enforcement authority for this law, even though it's available on your website
- your interpretation of the law requires that the company authorize the walk around representative
- you consider the local Union President to have the same status as a contractor or consultant
- you agree that the walk around representative cannot be currently laid-off, and further must be an active employee
- your agency can do nothing to ensure that the active employee mentioned above be excused to participate
- you suggested that if our authorized representative was not excused from their shift by the company, that they use a sick day in order to participate

Please consider this a formal request for your agency to provide me with clear guidance on how to have a walk around representative present during NRC inspections. In this guidance, I would like the following answered:

- What is the correct procedure, according to your agency for a representative authorized by the workers to participate in these inspections as a walk around representative? Please be detailed because you are very aware of our attempts this past week and given our resistance from Honeywell and your agency, I want to make sure that we do it correctly.
- What agency enforces this law since we have been told that you do not and why is it on the NRC website if your agency will not enforce it?

Furthermore, I am requesting that the NRC conduct a community meeting in Metropolis, Illinois as soon as possible to discuss this incident and the inspection.

Stephen D. Lech
President
USW local 7-669

Cc: USW Health and Safety
USW District 7 Counsel

NRC Office of Inspector General

United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union